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Walmart Inc.***UNITED STATES DISTRICT COURT****DISTRICT OF NEVADA**

LISA FRIEDMAN, individually,

Plaintiff,

vs.

WALMART INC., a Delaware corporation;  
DOES I-V; and ROE CORPORATIONS I-V,  
inclusive,

Defendants.

Case No.: 2:21-cv-01552-JCM-EJY

**STIPULATED PROTECTIVE ORDER  
BETWEEN PLAINTIFF LISA  
FRIEDMAN AND DEFENDANT  
WALMART INC.**

The parties to this action, Defendant WALMART INC. (hereafter "Walmart" or "Defendant") and Plaintiff LISA FRIEDMAN ("Plaintiff") (collectively, the "Parties"), by their respective counsel, hereby stipulate and request that the Court enter a stipulated protective order pursuant as follows:

1. The Protective Order shall be entered pursuant to *the Federal Rules of Civil Procedure*.
2. The Protective Order shall govern all materials deemed to be "Confidential Information."

Such Confidential Information shall include the following:

- (a) Any and all documents referring or related to confidential and proprietary human resources or business information; financial records of the parties; compensation

1 of Defendant's current or former personnel; policies, procedures and/or training  
2 materials of Defendant and/or Defendant's organizational structure;

3 (b) Any documents from the personnel, medical or workers' compensation file of  
4 any current or former employee or contractor;

5 (c) Any documents relating to the medical and/or health information of any of  
6 Defendant's current or former employees or contractors;

7 (d) Any portions of depositions (audio or video) where Confidential Information is  
8 disclosed or used as exhibits.  
9

10 3. In the case of documents and the information contained therein, designation of  
11 Confidential Information produced shall be made by (1) identifying said documents as confidential in  
12 Defendant's FRCP 26(a) disclosures and any supplements made thereto; (2) placing the following  
13 legend on the face of the document and each page so designated "CONFIDENTIAL;" or (3) otherwise  
14 expressly identified as confidential via written correspondence. Defendant will use its best efforts to  
15 limit the number of documents designated Confidential.

16 4. Confidential Information shall be held in confidence by each qualified recipient to whom  
17 it is disclosed, shall be used only for purposes of this action, shall not be used for any business purpose,  
18 and shall not be disclosed to any person who is not a qualified recipient. All produced Confidential  
19 Information shall be carefully maintained so as to preclude access by persons who are not qualified  
20 recipients.

21 5. Qualified recipients shall include only the following:

22 (a) In-house counsel and law firms for each party and the secretarial, clerical and  
23 paralegal staff of each;

24 (b) Deposition notaries and staff;

25 (c) Persons other than legal counsel who have been retained or specially employed  
26 by a party as an expert witness for purposes of this lawsuit or to perform  
27 investigative work or fact research;

28 (d) Deponents during the course of their depositions or potential witnesses of this

1 case; and

2 (e) The parties to this litigation, their officers and professional employees.

3 6. Each counsel shall be responsible for providing notice of the Protective Order and the  
4 terms therein to persons to whom they disclose "Confidential Information," as defined by the terms of  
5 the Protective Order.

6 Persons to whom confidential information is shown shall be informed of the terms of this Order  
7 and advised that its breach may be punished or sanctioned as contempt of the Court. Such deponents  
8 may be shown Confidential materials during their deposition but shall not be permitted to keep copies  
9 of said Confidential materials nor any portion of the deposition transcript reflecting the Confidential  
10 Information.

11 If either party objects to the claims that information should be deemed Confidential, that party's  
12 counsel shall inform opposing counsel in writing within thirty (30) days of receipt of the Confidential  
13 materials that the information should not be so deemed, and the parties shall attempt first to dispose of  
14 such disputes in good faith and on an informal basis. If the parties are unable to resolve their dispute,  
15 they may present a motion to the Court objecting to such status. The information shall continue to have  
16 Confidential status during the pendency of any such motion. The party asserting the label of  
17 "Confidential" shall bear the burden of showing the same within said motion to show why said  
18 document is entitled to such protection.

19 7. No copies of Confidential Information shall be made except by or on behalf of attorneys  
20 of record, in-house counsel or the parties in this action. Any person making copies of such information  
21 shall maintain all copies within their possession or the possession of those entitled to access to such  
22 information under the Protective Order.

23 8. Any party that inadvertently discloses or produces in this action a document or  
24 information that it considers privileged or otherwise protected from discovery, in whole or in part, shall  
25 not be deemed to have waived any applicable privilege or protection by reason of such disclosure or  
26 production if, within 14 days of discovering that such document or information has been disclosed or  
27 produced, the producing party gives written notice to the receiving party identifying the document or  
28 information in question, the asserted privileges or protection, and the grounds there for, with a request



1 that all copies of the document or information be returned or destroyed. The receiving party shall return  
2 or destroy the inadvertently disclosed documents, upon receipt of appropriately marked replacement  
3 documents. The dispute resolution process in paragraph 6 shall apply to this paragraph 8.

4 9. The termination of this action shall not relieve the parties and persons obligated  
5 hereunder from their responsibility to maintain the confidentiality of information designated  
6 confidential pursuant to this Order.

7 10. Within thirty (30) days of the final adjudication or resolution of this Lawsuit, the party  
8 receiving Confidential Information shall destroy all Confidential Material, including all copies and  
9 reproductions thereof, to counsel for the designating party.

10 11. Nothing in this Order shall be construed as an admission to the relevance, authenticity,  
11 foundation or admissibility of any document, material, transcript or other information.

12 12. Nothing in the Protective Order shall be deemed to preclude any party from seeking and  
13 obtaining, on an appropriate showing, a modification of this Order.

14  
15 DATED this 7<sup>th</sup> day of September 2021.

16 **ER INJURY ATTORNEYS**

17  
18 JUSTIN G. RANDALL, ESQ.  
19 Nevada Bar No. 12476  
20 4765 South Durango Drive  
Las Vegas, NV 89147

21 *Attorneys for Plaintiff*  
22 *Lisa Friedman*

DATED this 9<sup>th</sup> day of September 2021.

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26 *Attorneys for Defendant*  
27 *Walmart Inc.*  
28

1 **Case Name: Lisa Friedman vs. Walmart Inc.**  
2 **Case No.: 2:21-cv-01552-JCM-EJY**

3 **ORDER**

4 The terms of the above stipulation for a protective order by and between Defendant Walmart  
5 Inc., and Plaintiff Lisa Friedman by their respective counsel, shall hereby be the ORDER of this Court.

6 DATED this 9th day of September, 2021.

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8 UNITED STATES MAGISTRATE JUDGE  
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